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April 6, 2022

VIA ECF

The Honorable Brian M. Cogan
U.S. District Court for the Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Force, et al. v. Qatar Charity, et al.*, 1:20-cv-02578-BMC

Dear Judge Cogan:

We represent defendant Qatar Charity in the above-referenced case. We write on behalf of all Defendants, pursuant to Your Honor's Individual Practice Rule I.E, to request a five-day extension of time in which to reply to Plaintiffs' Omnibus Memorandum of Law in Opposition to Motions to Dismiss of Defendants Qatar Charity, Qatar National Bank and Masraf al Rayan. ("Opposition") (ECF No. 68). Defendants request an extension of time from the current deadline (Friday, April 8, 2022) until Wednesday, April 13, 2022. This is Defendants' first request for an extension. Plaintiffs consent to this request and granting this request will not impact any other scheduled dates or conferences in this matter.

On January 28, 2022, the Court entered the following briefing schedule: "Defendants' motions due" February 14, 2022; "Plaintiffs' response due" February 28, 2022; "Defendants' reply due" March 7, 2022. (See Minute Entry and Order dated Jan. 28, 2022). Each defendant filed its respective motion to dismiss, as scheduled, on February 14, 2022. (ECF Nos. 55–57). On February 17, 2022, Plaintiffs filed a motion for jurisdictional discovery and requested the Court to stay briefing on Defendants' motions to dismiss or, in the alternative, "that the current deadline for Plaintiffs' response be extended to March 31, 2022." (ECF No 60 at 6). On February 28, 2022, the Court re-set the motion to dismiss briefing schedule as follows: "Plaintiff's time to respond to defendant's motion to dismiss is extended until" March 11, 2022; "Defendants' reply is extended until" March 18, 2022. (See Order dated Feb. 28, 2022). On March 3, 2022, the Court granted Plaintiffs' request, with the consent of all Parties, to extend the deadlines as follows: March 25, 2022, for Plaintiffs' opposition; April 8, 2022, for Defendants' replies. (See Order dated Mar. 3, 2022).

On March 25, 2022, Plaintiffs filed their 83-page Opposition (ECF No. 68), as well as two declarations (ECF Nos. 67, 69), which themselves attach 15 exhibits (ECF Nos. 67-1–14, 69-1). Defendants request this brief extension of time to reply given the volume of these submissions. Qatar Charity further requests this short extension because undersigned counsel is traveling internationally on an unexpected professional engagement from April 5, 2022, to April 10, 2022.

Accordingly, Qatar Charity respectfully requests Your Honor to extend the deadline for all Defendants to respond to Plaintiffs' Opposition until April 13, 2022. Thank you for your consideration of this matter.

Respectfully submitted,

/s/ John M. Hillebrecht

John M. Hillebrecht

Counsel for Qatar Charity

cc: All counsel of record (by ECF)